

**ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)**

STD. 399 (REV. 12/2013)

ECONOMIC IMPACT STATEMENT

DEPARTMENT NAME San Francisco Bay Cons & Dev Comm.	CONTACT PERSON Marc Zeppetello	EMAIL ADDRESS marc.zeppetello@bcdc.ca.gov	TELEPHONE NUMBER (415) 352-3655
DESCRIPTIVE TITLE FROM NOTICE REGISTER OR FORM 400 Amend BCDC Permit Application Fees			NOTICE FILE NUMBER Z

A. ESTIMATED PRIVATE SECTOR COST IMPACTS *Include calculations and assumptions in the rulemaking record.*

1. Check the appropriate box(es) below to indicate whether this regulation:

- | | |
|--|---|
| <input checked="" type="checkbox"/> a. Impacts business and/or employees | <input type="checkbox"/> e. Imposes reporting requirements |
| <input checked="" type="checkbox"/> b. Impacts small businesses | <input type="checkbox"/> f. Imposes prescriptive instead of performance |
| <input type="checkbox"/> c. Impacts jobs or occupations | <input checked="" type="checkbox"/> g. Impacts individuals |
| <input type="checkbox"/> d. Impacts California competitiveness | <input type="checkbox"/> h. None of the above (Explain below): |

*If any box in Items 1 a through g is checked, complete this Economic Impact Statement.**If box in Item 1.h. is checked, complete the Fiscal Impact Statement as appropriate.*

2. The San Francisco Bay Cons. & Dev. Comm. estimates that the economic impact of this regulation (which includes the fiscal impact) is:
(Agency/Department)

- ☒ Below \$10 million
- ☐ Between \$10 and \$25 million
- ☐ Between \$25 and \$50 million
- ☐ Over \$50 million *(If the economic impact is over \$50 million, agencies are required to submit a Standardized Regulatory Impact Assessment as specified in Government Code Section 11346.3(c))*

3. Enter the total number of businesses impacted: See AttachmentDescribe the types of businesses (Include nonprofits): Any enterprises that apply for a permit for an activity under BCDC's jurisdiction.Enter the number or percentage of total businesses impacted that are small businesses: See attachment4. Enter the number of businesses that will be created: None eliminated: NoneExplain: Amended permit application fees will not have any bearing on the creation or elimination of any business.

5. Indicate the geographic extent of impacts: ☐ Statewide

☒ Local or regional (List areas): San Francisco Bay; Suisun Marsh. See attachment.

6. Enter the number of jobs created: None and eliminated: NoneDescribe the types of jobs or occupations impacted: Not applicable

7. Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here? ☐ YES ☒ NO

If YES, explain briefly:

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ECONOMIC IMPACT STATEMENT (CONTINUED)**B. ESTIMATED COSTS** *Include calculations and assumptions in the rulemaking record.*1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime? \$ 346,384 See Attachment

a. Initial costs for a small business: \$ _____ Annual ongoing costs: \$ _____ Years: _____

b. Initial costs for a typical business: \$ 52,246* Annual ongoing costs: \$ none Years: _____

c. Initial costs for an individual: \$ _____ Annual ongoing costs: \$ _____ Years: _____

d. Describe other economic costs that may occur: _____

*increased average cost for a major permit; lower cost increases for other types of permits. See attachment.

2. If multiple industries are impacted, enter the share of total costs for each industry: Not applicable.3. If the regulation imposes reporting requirements, enter the annual costs a typical business may incur to comply with these requirements. Include the dollar costs to do programming, record keeping, reporting, and other paperwork, whether or not the paperwork must be submitted. \$ Not applicable.4. Will this regulation directly impact housing costs? ☐ YES ☒ NO

If YES, enter the annual dollar cost per housing unit: \$ _____

Number of units: _____

5. Are there comparable Federal regulations? ☐ YES ☒ NOExplain the need for State regulation given the existence or absence of Federal regulations: No federal regulations apply to BCDC permit application fees. BCDC permit application fees are authorized by State law.Enter any additional costs to businesses and/or individuals that may be due to State - Federal differences: \$ None**C. ESTIMATED BENEFITS** *Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*1. Briefly summarize the benefits of the regulation, which may include among others, the health and welfare of California residents, worker safety and the State's environment: The permit application fees collected BCDC are deposited in the State General Fund.Permit application fees revenue deposited in the General Fund will recover approximately 40% ofBCDC's total regulatory program costs. See attachment.2. Are the benefits the result of: ☐ specific statutory requirements, or ☒ goals developed by the agency based on broad statutory authority?Explain: Permit application fees are authorized by statute. Gov't Code section 66632(c); Pub. Res. Code section 29520(b).3. What are the total statewide benefits from this regulation over its lifetime? \$ 669,430. See Attachment.4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation: None**D. ALTERNATIVES TO THE REGULATION** *Include calculations and assumptions in the rulemaking record. Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*1. List alternatives considered and describe them below. If no alternatives were considered, explain why not: No change to application fees.Fees could be increased by a factor of 3.75, 5.0, or another specified factor, with the goal to recover 75%, 100%,or another percentage of BCDC's total regulatory program costs. Adjust fees annually instead of every five years.

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ECONOMIC IMPACT STATEMENT (CONTINUED)

2. Summarize the total statewide costs and benefits from this regulation and each alternative considered:

Regulation:	Benefit: \$	<u>669,430</u>	Cost: \$	<u>669,430</u>
Alternative 2:	Benefit: \$	<u>1,840,934</u>	Cost: \$	<u>1,840,934</u>
Alternative 3:	Benefit: \$	<u>2,677,722</u>	Cost: \$	<u>2,677,722</u>

See attachment

3. Briefly discuss any quantification issues that are relevant to a comparison of estimated costs and benefits for this regulation or alternatives:

Estimates have been developed based on a 5-year survey of

permit applications and fee revenue. See attachment.

4. Rulemaking law requires agencies to consider performance standards as an alternative, if a regulation mandates the use of specific technologies or equipment, or prescribes specific actions or procedures. Were performance standards considered to lower compliance costs?

☐ YES☒ NOExplain: Not applicable.**E. MAJOR REGULATIONS** Include calculations and assumptions in the rulemaking record.*California Environmental Protection Agency (Cal/EPA) boards, offices and departments are required to submit the following (per Health and Safety Code section 57005). Otherwise, skip to E4.*1. Will the estimated costs of this regulation to California business enterprises exceed \$10 million? ☐ YES ☒ NO

If YES, complete E2. and E3

If NO, skip to E4

2. Briefly describe each alternative, or combination of alternatives, for which a cost-effectiveness analysis was performed:

Alternative 1: _____

Alternative 2: _____

(Attach additional pages for other alternatives)

3. For the regulation, and each alternative just described, enter the estimated total cost and overall cost-effectiveness ratio:

Regulation: Total Cost \$ _____ Cost-effectiveness ratio: \$ _____

Alternative 1: Total Cost \$ _____ Cost-effectiveness ratio: \$ _____

Alternative 2: Total Cost \$ _____ Cost-effectiveness ratio: \$ _____

4. Will the regulation subject to OAL review have an estimated economic impact to business enterprises and individuals located in or doing business in California exceeding \$50 million in any 12-month period between the date the major regulation is estimated to be filed with the Secretary of State through 12 months after the major regulation is estimated to be fully implemented?

☐ YES☒ NOIf YES, agencies are required to submit a Standardized Regulatory Impact Assessment (SRIA) as specified in Government Code Section 11346.3(c) and to include the SRIA in the Initial Statement of Reasons.

5. Briefly describe the following:

The increase or decrease of investment in the State: _____

None

The incentive for innovation in products, materials or processes: _____

None

The benefits of the regulations, including, but not limited to, benefits to the health, safety, and welfare of California residents, worker safety, and the state's environment and quality of life, among any other benefits identified by the agency: Application fee revenue deposited in General Fund will reimburse the State a portion of BCDC's General Fund appropriation for agency programs.

**ECONOMIC AND FISCAL IMPACT STATEMENT
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FISCAL IMPACT STATEMENT**A. FISCAL EFFECT ON LOCAL GOVERNMENT** *Indicate appropriate boxes 1 through 6 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

- ☐ 1. Additional expenditures in the current State Fiscal Year which are reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

\$ None

- ☐ a. Funding provided in _____

Budget Act of _____ or Chapter _____, Statutes of _____

- ☐ b. Funding will be requested in the Governor's Budget Act of _____

Fiscal Year: _____

- ☒ 2. Additional expenditures in the current State Fiscal Year which are NOT reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

\$ None (current year); \$259,379 annual average (subsequent years)*Check reason(s) this regulation is not reimbursable and provide the appropriate information:*

- ☐ a. Implements the Federal mandate contained in _____

- ☐ b. Implements the court mandate set forth by the _____ Court.

Case of: _____ vs. _____

- ☐ c. Implements a mandate of the people of this State expressed in their approval of Proposition No. _____

Date of Election: _____

- ☒ d. Issued only in response to a specific request from affected local entity(s).

Local entity(s) affected: Local entities that apply to BCDC for a permit or permit amendment.

- ☐ e. Will be fully financed from the fees, revenue, etc. from: _____

Authorized by Section: _____ of the _____ Code;

- ☐ f. Provides for savings to each affected unit of local government which will, at a minimum, offset any additional costs to each;

- ☐ g. Creates, eliminates, or changes the penalty for a new crime or infraction contained in _____

- ☐ 3. Annual Savings. (approximate)

\$ _____

- ☐ 4. No additional costs or savings. This regulation makes only technical, non-substantive or clarifying changes to current law regulations.

- ☐ 5. No fiscal impact exists. This regulation does not affect any local entity or program.

- ☒ 6. Other. Explain See Attachment.

**ECONOMIC AND FISCAL IMPACT STATEMENT
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FISCAL IMPACT STATEMENT (CONTINUED)**B. FISCAL EFFECT ON STATE GOVERNMENT** Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.☒ 1. Additional expenditures in the current State Fiscal Year. (Approximate)\$ None (current year); \$63,667 annual average (subsequent years)

It is anticipated that State agencies will:

☐ a. Absorb these additional costs within their existing budgets and resources.☐ b. Increase the currently authorized budget level for the _____ Fiscal Year☐ 2. Savings in the current State Fiscal Year. (Approximate)

\$ _____

☐ 3. No fiscal impact exists. This regulation does not affect any State agency or program.☒ 4. Other. Explain See Attachment.**C. FISCAL EFFECT ON FEDERAL FUNDING OF STATE PROGRAMS** Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

\$ _____

☐ 2. Savings in the current State Fiscal Year. (Approximate)

\$ _____

☒ 3. No fiscal impact exists. This regulation does not affect any federally funded State agency or program.☐ 4. Other. Explain _____

FISCAL OFFICER SIGNATURE



DATE

02/14/19*The signature attests that the agency has completed the STD. 399 according to the instructions in SAM sections 6601-6616, and understands the impacts of the proposed rulemaking. State boards, offices, or departments not under an Agency Secretary must have the form signed by the highest ranking official in the organization.*

AGENCY SECRETARY



DATE

2/14/19*Finance approval and signature is required when SAM sections 6601-6616 require completion of Fiscal Impact Statement in the STD. 399.*

DEPARTMENT OF FINANCE PROGRAM BUDGET MANAGER



DATE

SUPPLEMENT TO FORM 399

Proposed Amendments to the San Francisco Bay Conservation and Development Commission Permit Application Fees

ECONOMIC IMPACT STATEMENT

Introduction. The existing regulations of the San Francisco Bay Conservation and Development Commission (Commission or BCDC) establish fees for permit applications and applications to amend existing permits submitted by private parties (including individuals, small businesses, corporations, and non-profit organizations), state government agencies, and local governments. The Commission also receives consistency determinations submitted by federal government agencies under the Coastal Zone Management Act, but does not assess fees to process such consistency determinations. The number of applications varies every year and, thus, there is no way to predict the actual numbers and types of applications that BCDC would receive in future years from each type of applicant.

To estimate the impacts of the proposed amended fees (and potential alternatives to the proposed amended fees) on each type of applicant, Commission staff conducted a survey of the applications filed during the five State fiscal years 2012/2013 through 2016/2017. This survey allowed staff to determine the numbers and types of applications and amount of fees received over time, by the type of permittee. The survey also allowed staff to calculate the annual average number of each type of application filed by each type of permittee.

The Commission's application fees for major permits, administrative permits, and permit amendments generally vary with the total project cost (TPC). Higher application fees apply to larger, more costly projects, and lower fees apply to smaller, less costly projects. Because the size and costs of projects for which applications are submitted vary over time, there is no way to predict the amount of fee revenue that will be received for various types of applications in future years. However, the results of the five-year survey of permit applications allowed staff to calculate an annual average application fee for major permits, administrative permits, and permit amendments during this period. Staff have used those annual average fees to estimate the annual average fee revenue from the proposed amended fees by type of application and type of applicant.

Attachments One and Two are spreadsheets of the survey results that show the number of applications filed and the fee revenue received, respectively, in each fiscal year, in total for the five-year survey period, and as an annual average, by type of application and by type of applicant.

Attachment Three is a spreadsheet based on the survey results that shows the annual average fees paid during the five-year survey period by type of application for major permits, minor permits, and amendments. Attachment Three also shows the estimated average fees for each of these application types under the proposed amended fees.

Section A-3: The number of businesses impacted will depend on which businesses voluntarily decide to apply for a permit, or to amend an existing permit, for a project or other regulated activity within the Commission's jurisdiction. As shown in Attachment One, staff estimate that annually approximately 97.2 private parties will be impacted by the proposed amended fees. During the five-year survey period, the annual number of private parties that filed an application and paid a fee ranged from 84 to 108. It is not feasible to calculate the percentage of private parties impacted that are small businesses because neither the Commission's application form nor its fee recordkeeping distinguishes between or among the types of private parties submitting an application or paying an application fee.

Section A-5 Geographic Extent of Impacts: Commission permits are required for certain types of activities within its jurisdiction, which includes San Francisco Bay proper from the Golden Gate to the south end of San Francisco Bay, and also to the east end of Suisun Bay (but not including the Delta). The Commission's jurisdiction also includes a strip of land 100 feet wide extending around the upland edge of San Francisco Bay, as well as salt ponds, managed wetlands, and certain named waterways that empty into the Bay, and the primary management area of the Suisun Marsh.

Section B Estimated Costs. Total statewide dollar costs that private parties may incur over lifetime of regulation. The current fees were established with the goal to recover 20% of the Commission's total regulatory program costs. The proposed increased fees would be established with the goal to recover 40% of the Commission's total regulatory program costs. All applicants for a Commission permit or permit amendment, including businesses and individuals, would pay an increased fee – double the current fee – when submitting a permit application or application to amend a permit. Application fees are not imposed annually or on a recurring basis. Instead, they are imposed once, when an application is filed. An existing permittee that has previously paid a permit application fee is required to pay a subsequent fee if the permittee desires to amend an existing permit.

Attachment Four is a spreadsheet, based on the five-year survey of applications and fees paid, as discussed above, that shows for private parties and by type of application: (1) the average annual number of applications; (2) the annual average fee revenue under the current fees; and (3) the estimated annual average fee revenue that would be generated under the proposed amended fees. As noted above, the fee revenue figures are annual averages by type of application. Staff expect the actual fee revenues to fluctuate each year by the number of applications received and the size and cost of the projects for which applications are submitted. Over a five-year period, the fee revenues should approximate the annual averages shown in Attachment Four.

As also shown in Attachment Four, staff estimate that approximately 97.2 private-party permit applicants would pay an average total of approximately \$692,769 annually in fees, an increase of approximately \$346,384 from the average amount that such parties would pay under the current fees. As under the current fees, the fees paid would vary according to the type of permit application and total project costs. For applicants for

major permits, administrative permits, and permit amendments, the estimated annual costs of the increased fees would be, respectively:

- Approximately 3.4 private-party applicants for a major permit would pay an average total of approximately \$355,273 in fees annually, an increase of approximately \$177,636 from the average annual amount that such applicants would pay under the current fees.
- Approximately 17.4 private-party applicants for an administrative permit would pay an average total of approximately \$109,968 in fees annually, an increase of approximately \$54,984 from the average annual amount that such applicants would pay under the current fees.
- Approximately 44.4 private-party applicants for a permit amendment would pay an average total of approximately \$216,228 in fees annually, an increase of approximately \$108,114 from the average annual amount that such applicants would pay under the current fees.

As noted above, application fees for major permits, administrative permits, and permit amendments vary with the TPC. Under the current fees, for larger, more costly projects application fees range from 0.04% to 0.20% of the TPC, depending on the type of application and the TPC. Under the proposed fees, the increased application fees for larger, more costly projects would range from 0.08% to 0.40% of TPC, depending on the type of application and the TPC. Thus, the proposed increase in application fees, which would double the current fees, would be a relatively small increase in costs to private-party applicants when compared to the total value of the projects for which applications are filed.

Permit application fees would be adjusted every five years. The regulation would provide that the fees would be adjusted either up or down if the average annual fee revenue generated over the preceding five years does not equal 40% of the Commission's highest annual total regulatory program costs over those years. If the Commission's total regulatory program costs increase in future, the fees could increase, assuming the fee revenues do not also increase.

Section C Estimated Benefits: The proposed amended fee regulation is expected to generate revenues equal to 40% of the Commission's total regulatory program costs, which would be collected as fee revenue and deposited into the State General Fund, as requested by the Department of Finance.

Attachment Five applies the annual average application fees from the five-year survey (for major and administrative permits and permit amendments) and the current and proposed fees for time extensions and regionwide permits to the annual average number of permit applications for all applicants, by type of application, to calculate the estimated fee revenue under the proposed amended fees (as well as under alternatives to the proposed amended fees, as discussed below). As shown in Attachment Five, staff estimate that the annual average fee revenue from all applicants would be approximately \$1,338,861, an increase of approximately \$669,430 from the annual

average amount of fee revenue generated from the current fees. The figure of \$1,338,861 is an annual average; staff expect the actual annual fee revenues would fluctuate each year. Over a five-year period, the fee revenue should reflect these annual averages.

Section D Alternatives to the Regulation; Costs and Benefits: Attachment Five shows the estimated annual average fee revenue under each of the following alternatives to the proposed amended fees: (1) the current fees would remain unchanged; (2) all fees would be increased by a factor of 3.75, with the goal of recovering 75% of the Commission's total regulatory program costs; and (3) all fees would be increased by 5.0, with the goal of recovering 100% of the Commission's total regulatory program costs.

As shown in Attachment Five, staff estimate that:

- If the permit application fees remain unchanged (*i.e.*, if the fee regulation is not amended) the annual average fee revenue from all applicants would be approximately \$669,430. This figure is an annual average; staff expect the actual annual fee revenues would fluctuate each year.
- If the permit application fees were increased by a factor of 3.75, with the goal of recovering 75% of the Commission's total regulatory program costs, the annual average fee revenue from all applicants would be approximately \$2,510,364, an increase of approximately \$1,840,934 from the annual average amount of fee revenue generated from the current fees. The figure of \$2,510,364 is an annual average; staff expect the actual annual fee revenues would fluctuate each year.
- If the permit application fees were increased by a factor of 5.0, with the goal of recovering 100% of the Commission's total regulatory program costs, the annual average fee revenue from all applicants would be approximately \$3,347,152, an increase of approximately \$2,677,722 from the annual average amount of fee revenue generated from the current fees. The figure of \$3,347,152 is an annual average; staff expect the actual annual fee revenues would fluctuate each year.

Under each of the alternatives, the average annual amount of fees paid would represent a combined total cost to an average of approximately 173.8 applicants expected to apply each year for various types of permits or to amend an existing permit. At the same time, the average annual amount of fee revenue would be a benefit to the State by allowing the Commission to contribute the fee revenue to the State General Fund to provide reimbursement for disbursements from the General Fund used support the Commission's regulatory program.

FISCAL IMPACT STATEMENT

Section A Fiscal Effect on Local Government and

Section B Fiscal Effect on State Government

Local and State governments must pay an application fee for projects they propose within the Commission's jurisdiction or to amend existing Commission permits issued to such agencies. Any changes to the fee schedule will apply equally to all applicants. The source of the state and local funds for application fees, and other fees incurred due to the proposed projects, is not known.

Attachment Six is a spreadsheet that shows for local government applicants and by type of application: (1) the average annual number of applications; (2) the annual average fee revenue under the current fees; and (3) the estimated annual average fee revenue that would be generated by the proposed amended fees. As noted above, the fee revenue figures are estimated annual averages by type of application; staff expect the actual fee revenues to fluctuate each year by the number of applications received and the size and cost of the projects for which applications are submitted, but over a five-year period, the fee revenues should approximate the annual averages shown in the spreadsheet.

As shown in Attachment Six, staff estimate that annually, the approximately 53 local government permit applicants would pay an average total of approximately \$518,758 in fees, an increase of approximately \$259,379 from the average amount that such parties would pay under the current fees. As under the current fees, the fees paid would vary according to the type of permit application and total project costs. For applicants for major permits, administrative permits, and permit amendments, the estimated annual costs of the increased fees would be, respectively:

- Approximately 3.2 local government applicants for a major permit would pay an average total of approximately \$334,374 in fees annually, an increase of approximately \$167,187 from the average annual amount that such applicants would pay under the current fees.
- Approximately 8.6 local government applicants for an administrative permit would pay an average total of approximately \$54,352 in fees annually, an increase of approximately \$27,176 from the average annual amount that such applicants would pay under the current fees.
- Approximately 25.6 local government applicants for a permit amendment would pay an average total of approximately \$124,672 in fees annually, an increase of approximately \$62,336 from the average annual amount that such applicants would pay under the current fees.

Attachment Seven is a spreadsheet that shows for state government applicants and by type of application: (1) the average annual number of applications; (2) the annual average fee revenue under the current fees; and (3) the estimated annual average fee revenue that would be generated by the proposed amended fees. As noted above, the fee revenue figures are estimated annual averages by type of application; staff expect

the actual fee revenues to fluctuate each year by the number of applications received and the size and total cost of the projects for which applications are submitted. However, over a five-year period, the fee revenues should approximate the annual averages shown in Attachment Seven.

As also shown in Attachment Seven, staff estimate that annually, the approximately 12.6 state government permit applicants would pay an average total of approximately \$127,334 in fees, an increase of approximately \$63,667 from the average amount that such parties would pay under the current fees. As under the current fees, the fees paid would vary according to the type of permit application and total project costs. For applicants for major permits, administrative permits, and permit amendments, the estimated annual costs of the increased fees would be, respectively:

- Approximately 0.8 state government applicants for a major permit would pay an average total of approximately \$83,594 in fees annually, an increase of approximately \$41,797 from the average annual amount that such applicants would pay under the current fees.
- Approximately 2.4 state government applicants for an administrative permit would pay an average total of approximately \$15,168 in fees annually, an increase of approximately \$7,584 from the average annual amount that such applicants would pay under the current fees.
- Approximately 5.6 state government applicants for a permit amendment would pay an average total of approximately \$27,272 in fees annually, an increase of approximately \$13,636 from the average annual amount that such applicants would pay under the current fees.

As noted above, application fees for major permits, administrative permits, and permit amendment vary with the TPC. Under the current fees, for larger, more costly projects application fees range from 0.04% to 0.20% of the TPC, depending on the type of application and the TPC. Under the proposed fees, the increased application fees for larger, more costly projects would range from 0.08% to 0.40% of TPC, depending on the type of application and the TPC. Thus, for local and state government applicants, like private party applicants, the proposed increase in application fees would be a relatively small increase in costs when compared to the total value of the projects for which applications are filed. Due to the small percentage increase in the total project cost that would be added as an increased application fee, the cost impact to local and state government applicants would not be significant.

ATTACHMENT ONE
Number of Permit Applications by Type of Application and Type of Applicant

FY 18/17	Federal	State	Local Government	Private/NGO	Total
Major	0	1	3	1	5
Administrative	0	4	8	13	25
Amendment	0	7	33	48	88
Time Extension	0	0	2	12	14
Regionwide	0	2	17	20	39
Federal Consistency	13	0	0	0	13
Total	13	14	63	94	184
FY 15/16	Federal	State	Local Government	Private/NGO	Total
Major	0	2	3	4	9
Administrative	0	3	15	14	32
Amendment	0	4	19	44	67
Time Extension	0	2	7	11	20
Regionwide	0	5	9	22	36
Federal Consistency	13	0	0	0	13
Total	13	16	53	95	177
FY 14/15	Federal	State	Local Government	Private/NGO	Total
Major	0	1	3	4	8
Administrative	0	2	7	28	37
Amendment	0	8	26	43	77
Time extension	0	2	10	15	27
Regionwide	0	1	4	18	23
Federal Consistency	8	0	0	0	8
Total	8	14	50	108	180
FY 13/14	Federal	State	Local Government	Private/NGO	Total
Major	0	0	5	5	10
Administrative	0	0	6	24	30
Amendment	0	5	28	45	78
Time Extension	0	5	7	19	31
Regionwide	0	0	5	12	17
Federal Consistency	10	0	0	0	10
Total	10	10	51	105	176
FY 12/13	Federal	State	Local Government	Private/NGO	Total
Major	0	0	2	3	5
Administrative	0	3	7	8	18
Amendment	0	4	22	42	68
Time Extension	0	2	10	18	30
Regionwide	0	0	5	13	18
Federal Consistency	11	0	2	0	13
Total	11	9	48	84	152
Types of Permit App. Over Five Year Period from FY 12 - 17	Federal	State	Local Government	Private/NGO	Total
Major	0	4	16	17	37
Administrative	0	12	43	87	142
Amendment	0	28	128	222	378
Time Extension	0	11	36	75	122
Regionwide	0	8	40	85	133
Federal Consistency	55	0	2	0	57
Total	55	63	265	486	869
Yearly Average for Five Year Period FY 12 - 17	Federal	State	Local Government	Private/NGO	Total
Major	0	0.8	3.2	3.4	7.4
Administrative	0	2.4	8.6	17.4	28.4
Amendment	0	5.6	25.6	44.4	75.6
Time Extension	0	2.2	7.2	15	24.4
Regionwide	0	1.6	8	17	26.6
Federal Consistency	11	0	0.4	0	11.4
Total	11	12.6	53	97.2	173.8

ATTACHMENT TWO
Application Fees Paid by Type of Application and Type of Applicant

FY 16/17	State	Local Government	Private/NGO	Total
Major	\$20,000.00	\$78,800.00	\$42,500.00	\$141,300.00
Administrative	\$18,730.00	\$75,442.00	\$30,752.00	\$124,924.00
Amendment	\$2,552.00	\$159,199.00	\$75,803.00	\$237,554.00
Other (Time Extension, Regionwide, Emergency Permit)				\$28,101.00
Total	\$41,282.00	\$313,441.00	\$149,055.00	\$531,879.00
FY 15/16	State	Local Government	Private/NGO	Total
Major	\$96,000.00	\$696,000.00	\$73,340.00	\$865,340.00
Administrative	\$14,730.00	\$65,537.00	\$24,595.00	\$104,862.00
Amendment	\$153,961.00	\$27,634.00	\$77,991.00	\$259,586.00
Other (Time Extension, Regionwide, Emergency Permit)				\$11,263.00
Total	\$264,691.00	\$789,171.00	\$175,926.00	\$1,241,051.00
FY 14/15	State	Local Government	Private/NGO	Total
Major	\$20,000.00	\$30,055.00	\$664,675.00	\$714,730.00
Administrative	\$1,720.00	\$24,206.00	\$53,216.00	\$79,142.00
Amendment	\$7,550.00	\$18,336.00	\$146,370.00	\$172,256.00
Other (Time Extension, Regionwide, Emergency Permit)				\$67,200.00
Total	\$29,270.00	\$72,597.00	\$864,261.00	\$1,033,328.00
FY 13/14	State	Local Government	Private/NGO	Total
Major	\$0.00	\$58,683.00	\$82,335.00	\$141,018.00
Administrative	\$0.00	\$12,218.00	\$28,260.00	\$40,478.00
Amendment	\$58,215.00	\$45,812.00	\$23,030.00	\$127,057.00
Other (Time Extension, Regionwide, Emergency Permit)				\$26,773.00
Total	\$58,215.00	\$116,713.00	\$133,625.00	\$335,326.00
FY 12/13	State	Local Government	Private	Total
Major	\$0.00	\$61,861.00	\$8,850.00	\$70,711.00
Administrative	\$1,575.00	\$71,336.00	\$26,351.00	\$99,262.00
Amendment	\$1,817.00	\$59,273.00	\$62,926.00	\$124,016.00
Other (Time Extension, Regionwide, Emergency Permit)				\$6,255.00
Total	\$3,392.00	\$192,470.00	\$98,127.00	\$300,244.00
Total 5yrs	State	Local Government	Private	Total
Major	\$136,000.00	\$925,399.00	\$871,700.00	\$1,933,099.00
Administrative	\$36,755.00	\$248,739.00	\$163,174.00	\$448,668.00
Amendment	\$224,095.00	\$310,254.00	\$386,120.00	\$920,469.00
Other (Time Extension, Regionwide, Emergency Permit)				\$139,592.00
Total	\$396,850.00	\$1,484,392.00	\$1,420,994.00	\$3,441,828.00
Average over 5yrs	State	Local Government	Private	Total
Major	\$27,200.00	\$185,080.00	\$174,340.00	\$386,620.00
Administrative	\$7,351.00	\$49,748.00	\$32,635.00	\$89,734.00
Amendment	\$44,819.00	\$62,051.00	\$77,224.00	\$184,094.00
Other (Time Extension, Regionwide, Emergency Permit)				\$27,918.00
Total	\$79,370.00	\$296,879.00	\$284,199.00	\$688,366.00

ATTACHMENT THREE**Annual Average Fees by Type of Application Under Current Fees and Proposed Fees**

Application Type	Annual Average Fees Paid	Average Number of Applications	Average Fee (Current Fees)	Estimated Average Fee (Proposed Fees)
Major	\$386,620	7.4	\$52,246	\$104,492
Administrative	\$89,734	28.4	\$3,160	\$6,320
Amendment	\$184,094	75.6	\$2,435	\$4,870

ATTACHMENT FOUR**Annual Average Fee Revenue from Private Parties under Current Fees and Proposed Fees**

Application Type	Number of Applications	Average Fee (Current Fees)	Annual Average Fee Revenue (Current Fees)	Estimated Average Annual Fee Revenue (Proposed Fees)
Major	3.4	\$52,246	\$177,636	\$355,273
Administrative	17.4	\$3,160	\$54,984	\$109,968
Amendment	44.4	\$2,435	\$108,114	\$216,228
Time Extension	15	\$150	\$2,250	\$4,500
Regionwide	17	\$200	\$3,400	\$6,800
Federal Consistency	0	\$0	\$0	\$0
Total	97.2		\$346,384	\$692,769

ATTACHMENT FIVE

Annual Average Fee Revenue from All Applicants under Current Fees, Proposed Fees, and Alternatives

Application Type	Number of Applications	Average Fee (Current Fees)	Annual Average Fee Revenue (Current Fees)	Estimated Average Annual Fee Revenue Proposed Fees	Estimated Annual Average Alternative Fee Revenue (1:3.75)	Estimated Annual Average Alternative Fee Revenue (1:5)
Major	7.4	\$52,246	\$386,620	\$773,241	\$1,449,827	\$1,933,102
Administrative	28.4	\$3,160	\$89,744	\$179,488	\$336,540	\$448,720
Amendment	75.6	\$2,435	\$184,086	\$368,172	\$690,323	\$920,430
Time Extension	24.4	\$150	\$3,660	\$7,320	\$13,725	\$18,300
Regionwide	26.6	\$200	\$5,320	\$10,640	\$19,950	\$26,600
Federal Consistency	11.4	\$0	\$0	\$0	\$0	\$0
Total	173.8		\$669,430	\$1,338,861	\$2,510,364	\$3,347,152

ATTACHMENT SIX**Annual Average Fee Revenue from Local Governments under Current Fees and Proposed Fees**

Application Type	Number of Applicants	Average Fee (Current Fees)	Annual Average Fee Revenue (Current Fees)	Estimated Annual Average Fee Revenue (Proposed Fees)
Major	3.2	\$52,246	\$167,187	\$334,374
Administrative	8.6	\$3,160	\$27,176	\$54,352
Amendment	25.6	\$2,435	\$62,336	\$124,672
Time Extension	7.2	\$150	\$1,080	\$2,160
Regionwide	8	\$200	\$1,600	\$3,200
Federal Consistency	0.4	\$0	\$0	\$0
Total	53		\$259,379	\$518,758

ATTACHMENT SEVEN**Annual Average Fee Revenue from State Government under Current Fees and Proposed Fees**

Application Type	Number of Applicants	Average Fee (Current Fees)	Annual Average Fee Revenue (Current Fees)	Estimated Annual Average Fee Revenue (Proposed Fees)
Major	0.8	\$52,246	\$41,797	\$83,594
Administrative	2.4	\$3,160	\$7,584	\$15,168
Amendment	5.6	\$2,435	\$13,636	\$27,272
Time Extension	2.2	\$150	\$330	\$660
Regionwide	1.6	\$200	\$320	\$640
Federal Consistency	0	\$0	\$0	\$0
Total	12.6		\$63,667	\$127,334